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May 31, 2019

Via ECF, Email, and Hand Delivery

Hon. Denise L. Cote
United States District Court
Southern District of New York
500 Pearl Street, Room 1910
New York, New York 10007

Re: *Hyland, et al. v. Navient Corp., et al.*, No. 1:18-cv-09031

Dear Judge Cote:

Pursuant to Your Honor's Individual Practice Rule 4.A, Plaintiffs respectfully request permission to file the attached documents with redactions or under seal in support of Plaintiffs' Letter Motion to Compel dated May 30, 2019 (Dkt. 45).

Redactions. Pursuant to Rule 5.2 of the Federal Rules of Civil Procedure, Plaintiffs seek to redact the highlighted portions of Exhibit 3 (Dkt. 45-3) because they contain financial account numbers and home addresses.

Under Seal. Plaintiffs seek to file Exhibit 4 (Dkt. 45-4) under seal. This document has been designated "Confidential" by Defendants Navient Corporation and Navient Solutions, LLC (together, "Navient") under the Stipulated Confidentiality Agreement and Protective Order entered in this action (Dkt. 38) and, according to Navient, contains proprietary information. Specifically, Exhibit 4 contains call flow procedures Navient call center employees use to respond to borrower inquiries.

Plaintiffs intend to refile the Letter Motion to Compel dated May 30, 2019 (Dkt. 45) and accompanying exhibits upon the Court's endorsement of this request.

Respectfully submitted,

/s/ Lena Konanova

Lena Konanova

cc (via ECF): Counsel of record

Enclosures